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8 Attorneys for Plaintiff
9 United States of America

10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 SEAN DAVID MORTON and
17 MELISSA MORTON,

18 Defendants.

No. CR 15-611-SVW

**STIPULATION RE: RESTITUTION
LIABILITY**

19
20 Defendant, Melissa Morton (hereafter, “Ms. Morton” or “defendant”), by and
21 through her attorney of record, Angel Navarro, and plaintiff, the United States of
22 America, by and through its counsel of record, the United States Attorney’s Office for
23 the Central District of California, hereby stipulate and agree as follows:

- 24 1. On September 20, 2017, the Court issued the Judgment and Commitment Orders
25 for both defendant Sean David Morton and Melissa Morton. Docket Nos. 278,
26 280. In such Orders, the Court orders that each defendant pay restitution to the
27 IRS in the same amount, \$480,322.55.
28 2. The parties stipulate and request that the Court amend both Judgment and

1 Commitment orders to reflect that the restitution amount is a joint and several
2 liability between each of the defendants.

3 Dated: September 21, 2017

Respectfully submitted,
SANDRA R. BROWN
Acting United States Attorney
THOMAS D. COKER
Assistant United States Attorney
Chief, Tax Division

6 /s/

7 VALERIE L. MAKAREWICZ
8 JAMES C. HUGHES
Assistant United States Attorney
Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 Dated: September 21, 2017

11 /s/

12 ANGEL NAVARRO
Attorney for Defendant Melissa Morton

PROOF OF SERVICE BY MAILING

I am over the age of 18 and not a party to the within action. I am employed by the Office of the United States Attorney, Central District of California. My business address is 300 North Los Angeles Street, Suite 7211, Los Angeles, California 90012.

On **September 21, 2017**, I served

STIPULATION RE: RESTITUTION LIABILITY

on each person or entity name below by enclosing a copy in an envelope addressed as shown below and placing the envelope for collection and mailing on the date and at the place shown below following our ordinary office practices. I am readily familiar with the practice of this office for collection and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. Date of mailing: **September 21, 2017**

Place of mailing: Los Angeles, California

See attached list

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on: **September 21, 2017**, Los Angeles, California.

_____/s/_____

Barbara Le

1 RE: USA V. SEAN DAVID MORTON, ET AL

2 CASE NO.: CR 15-611 SVW

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4 Service List

5
6 Sean David Morton
7 565 Pier Avenue
8 Box 1274
9 Hermosa Beach, CA 90274-1274

10 Sean David Morton
11 1708342757
12 West Valley Detention Center
13 9500 Etiwanda Ave
14 Rancho Cucamonga, CA 91739
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